

SELF AUDIT DISCLOSURE REPORT CORRECTIVE ACTION 1

Updated as of: June 30, 2010

Facility Name: Kensington High School # 5010
Facility Address: 2051 E. Cumberland Street, Philadelphia, PA 19125
Date of Audit: 05/14/10
Date CAP Due to EPA: 7/20/10

Finding Number	Regulatory Citation	Finding	Corrective Action	Corrective Action Status (include date when closed)	Preventative Measure
ASBESTOS HAZARD EMERGENCY RESPONSE ACT (AHERA) PROGRAM 40 CFR § 763.94					
1	(40 CFR § 763.85(b))	The school is required to complete Three Year Re-inspections. Data gaps ranging from three (3) to six (6) months were identified following the original management plan of 1988, the 1995 and the 2001 Three Year Re-inspections. These inspections were not completed within the required three (3) year time frame.	The school must complete the Re-inspections every three (3) years. This is a historical finding as the school can not complete missing data gaps.	Historical finding. Corrective Action can not be completed.	A compliance calendar should be established and implemented to ensure the timely completion of the Three Year Re-inspections.
2	(40 CFR § 763.94)(d)	The school is required to complete Six Month Periodic Surveillance Inspections. Varied data gaps exist between the Six Month Periodic Surveillance Inspections from 1989 to 2008 ranging from one (1) to nineteen (19) months. These inspections were not completed within the required six (6) month time frame.	The school must complete Periodic Surveillance Inspections every six (6) months. This is a historical finding as the school can not complete past missed inspections.	Historical finding. Corrective Action can not be completed.	A compliance calendar should be established and implemented to ensure the timely completion of the Six Month Periodic Surveillance Inspections.
3	(40 CFR § 763.94)	The regulations require the school to maintain all Operations and Maintenance (O&M) records, only partial records were found at the school.	Prepare copies of the missing O&M records and distribute to the administration office for inclusion in the management plan. The following reports were not found at the school. Synertech 010-3123-17 1/31/09 Synertech 010-2905-3 11/30/07 ETC A07-0213-01 2/13/07 USA 07-010001-279 12/11/07 ETC A07-0213-02 2/13/07 Synertech 010-2625 3/31/06 Synertech 010-2660 8/30/06 Synertech 010-2623 4/30/06 Synertech 010-2386 8/31/05 USA 04-010001-36 4/13/04 USA 04-010001-37 5/11/04	Closed 6/30/10 - Copies of the missing response actions were prepared and distributed to the School for their records.	A letter should be sent to all school administrators reminding them of the AHERA record keeping procedures and the importance of maintaining all asbestos documentation.
4	(40 CFR § 763.94(g)(3))	The school is required to maintain copies of previous Re-inspection reports. The 1992 Re-inspection report was not found.	Prepare a copy from the central file and send to the school.	Closed 6/30/10 - A copy of the missing Re-inspection report was prepared and distributed to the School for their records.	Include notification letter instructing the school to maintain copies of previous Re-inspection reports.